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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

	§	
AXTRA, LLC and THE AXIA-AXTRA	8	
TRUST,	§	
Plaintiffs,	§	
	§	Civil Action No. 1:22-CV-00144
	§	
V.	§	
AXIA ISSUER, INC. and THE AXIA FOUNDATION,	§	
	§	
	§	
Defendants.	§	

DEFENDANTS' STIPULATED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' AMENDED COMPLAINT AND, IN THE ALTERNATIVE, RENEWED MOTION FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY [ECF NO. 51] AND PLAINTIFFS' OPPOSED MOTION FOR LEAVE TO CONDUCT JURISDICTIONAL AND VENUE DISCOVERY [ECF NO. 50]

Defendants AXIA Issuer, Inc. and AXIA Foundation Inc. (improperly named as the Axia Foundation) (collectively, "Defendants") hereby move for an extension of time to *Plaintiffs' Response to Defendants' Motion to Dismiss Plaintiffs' Amended Complaint and, in the Alternative*,

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Motion for Leave to Conduct Jurisdictional Discovery [ECF No. 51] (hereinafter "Plaintiffs"

Response"), and to respond to Plaintiffs' Motion for Leave to Conduct Jurisdictional and Venue

Discovery [ECF No. 50] (hereinafter "Plaintiffs' Motion").

Under the prior stipulated extensions granted by this Court, Defendants' reply to *Plaintiffs*'

Response must be filed by June 12, 2023. [ECF No. 45]. Per the Local Rules, Defendants' response

to Plaintiffs' Motion must be filed by June 19, 2023 (14 days from June 5). U.S.D.C.L.R.

7.1(b)(1)(B).

Given the interconnection and complexity of issues raised in both *Plaintiffs' Response* and

Plaintiffs' Motion, as well as Defendants' counsels' scheduling demands (which include a one-

week arbitration beginning June 12, 2023 for Mr. Smith), Defendants request that the Court extend

both the reply and response deadlines to June 26, 2023. This would result in a 14-day extension

for the reply and a 7-day extension for the response. Defendants do not believe these extensions

would impact any other matters before the Court in this case.

CERTIFICATE OF CONFERRAL

Defense counsel has conferred with Plaintiffs' counsel and Plaintiffs have agreed to

stipulate to the requested extensions.

Dated this 8th day of June, 2023.

CROWLEY FLECK PLLP

/s/ Holly L. Tysse

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of June, 2023, I electronically transmitted the foregoing document using the CM/ECF system which will send notification to all ECF Registrants in this action.

/s/ Holly L. Tysse
OF CROWLEY FLECK PLLP